

LAW OFFICES  
BROENING OBERG WOODS & WILSON  
PROFESSIONAL CORPORATION  
2800 NORTH CENTRAL, 16TH FLOOR  
PHOENIX, AZ 85004  
(602) 271-7700

Sarah L. Barnes /Bar No. 020362  
Kelley M. Jancaitis /Bar No. 025555  
Jeremiah M. Sullivan /Bar No. 038569  
E-mail: [slb@bowwlaw.com](mailto:slb@bowwlaw.com)

[kel@bowwlaw.com](mailto:kel@bowwlaw.com)  
[kmj@bowwlaw.com](mailto:kmj@bowwlaw.com)  
[szb@bowwlaw.com](mailto:szb@bowwlaw.com)

*Attorneys for Defendants City of  
Phoenix, Sullivan, Ladines, Garza, Roy,  
Makic, Ravelo, Ramirez, Howard,  
Traylor, and Reddy*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Kashane Kirk, *et al.*,

Plaintiffs,

vs.

City of Phoenix, *et al.*,

Defendants.

Case No. CV 23-00836-MTL (CDB)

**STIPULATED MOTION TO STAY  
CASE DEADLINES**

**(Expedited Consideration Requested)**

The parties, by and through counsel undersigned respectfully stipulate and request the Court stay the remaining case deadlines based on the Court's recent Order (Dk. 53) denying Defendants' Motion to Dismiss without prejudice and granting Plaintiffs leave to file a Second Amended Complaint. This Stipulated Request is made in good faith and not for the purpose of delay.

On September 5, 2024, the Court denied Defendants Motion to Dismiss without prejudice, and gave Plaintiffs until October 7, 2024, to file a Second Amended Complaint. If Plaintiffs fail to file a Second Amended Complaint on October 7, 2024, Defendants may

refile their Motion to Dismiss by October 14, 2024.

The parties are requesting the Court stay all deadlines in this matter while Plaintiffs prepare and file the Second Amended Complaint. Once the Second Amended Complaint is filed, Defendants will then assess whether to re-file a Motion to Dismiss and/or answer the amended Complaint. Moreover, once a Second Amended Complaint is filed, and Defendants have assessed what next steps are appropriate in this matter, the parties will be better situated to determine what deadlines are necessary to prepare this case for trial. Accordingly, the parties will file an amended Joint Report and Proposed Scheduling Order.

Thus, the Parties stipulate and respectfully request the Court agree to stay the current case deadlines while Plaintiffs prepare a Second Amended Complaint, and vacate any pending matters in this case. After Plaintiffs file a Second Amended Complaint and/or Defendants file an Answer or renew their Motion to Dismiss, the parties will prepare and file an amended Joint Report and Proposed Scheduling Order on or before October 31, 2024, which will set forth new deadlines for this matter. A proposed order is filed simultaneously herewith.

RESPECTFULLY SUBMITTED this 16th day of September, 2024.

BROENING OBERG WOODS & WILSON, P.C.

By /s/ Sarah L Barnes  
 Sarah L. Barnes  
 Kelley M. Jancaitis  
 Jeremiah M. Sullivan  
*Attorney for Defendants*

MILLS + WOODS LAW, PLLC

By /s/ Sean A. Woods (with permission)  
Sean A. Woods  
Robert T. Mills  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 16, 2024, I electronically filed the foregoing with the Clerk's Office using the CM/ECF system for filing, and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant:

Sean A. Woods  
Robert T. Mills  
MILLS + WOODS LAW, PLLC  
5055 North 12th Street, Suite 101  
Phoenix, Arizona 85014  
*Attorneys for Plaintiffs*

*/s/ Kathy Lake*

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